

**MEMO ENDORSED****Barchiesi Law PLLC**

Robert Barchiesi II - Attorney at Law

February 1, 2024

Via ECF

Hon. Jessica G. L. Clarke  
United States Courthouse  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

RE: Worksite Inc. et. al. v. Steptoe and Johnson PLLC et. al.  
23-CV-9221 (JGLC)

Dear Judge Clarke:

Pursuant to the Court's Order of October 27, 2023 (ECF Doc. No. 7), and in accordance with the Court's Individual Practices in Civil Cases under Rule 2(e), the parties respectfully submit this letter motion to request an adjournment of the Pretrial Conference currently scheduled for February 6, 2024, at 12:00 PM.

This is the first of such requests for adjournment and the parties are seeking to adjourn the February 6<sup>th</sup> Conference to a date approximately two weeks therefrom. The parties propose the following mutually agreed dates for the Court's further consideration. We leave open for the Court the afternoons of February 22nd, February 23rd, and February 26<sup>th</sup>, 2024, to reconvene the Conference to a date and time most convenient to the Court.

The reason for the requested adjournment is to allow the parties additional time to work through further discussions around a settlement offer that was extended by the Plaintiff today on February 1, 2024, following the parties meet and confer.

Given the parties' mutual desire to continue settlement discussions, which could potentially resolve this dispute without further court intervention, we believe this adjournment is in the best interests of all parties and promotes judicial economy.

This request is being filed contemporaneously with our responsive Joint Letter to your Honor's Order of October 27, 2023, in which the court also received a proposed case management plan from the parties. (ECF Doc. Nos. 19 & 20)

Thank you for your consideration of the Parties' Request for an Adjournment of the February 6<sup>th</sup> Conference.

Respectfully,

By: /s/ Robert C. Barchiesi  
Robert C. Barchiesi, II, Esq.

Application GRANTED. The initial pretrial conference previously scheduled for February 6, 2024 is hereby adjourned to **February 26, 2024 at 10:00 a.m.** The parties are ordered to file with the Court by **February 22, 2024** a status update indicating whether the matter has resolved and if not, whether the parties seek to be referred to a Magistrate Judge for a settlement conference or to the Southern District's Mediation Program. The Clerk of Court is respectfully directed to terminate the motion as ECF No. 21.

SO ORDERED.

JESSICA G. L. CLARKE  
United States District Judge

Dated: February 2, 2024  
New York, New York